
Section 8. Alternatives Considered

In accordance with the requirements for the ITP, Simpson has considered alternatives to the proposed taking of Covered Species and explained why the alternatives were not selected. The alternatives were identified during preparation of the AHCP/CCAA and as part of the scoping process for the EIS. The alternatives considered in the Plan also are considered in the EIS for the Services' actions on the ITP and ESP. The primary alternatives considered by Simpson are:

- No Permits/No Plan
- Listed ITP Species Only
- Simplified Prescriptions Strategy
- Expanded Plan Area/Species List

8.1 NO PERMITS/NO PLAN

This alternative is comparable to the "no action" alternative considered in the EIS and would require Simpson to continue to be subject to existing legal and regulatory requirements, including the ESA take prohibition which would apply to all of the ITP species as well as all other listed species in the Plan Area (excluding NSO). Under the No Permits/No Plan Alternative,

- Simpson would not seek authorization for take of the listed or unlisted Covered Species;
- The proposed ITP and ESP would not be issued;
- This AHCP/CCAA would not be implemented; and
- Timber operations and related activities would occur in the Plan Area in accordance with existing state and federal regulations, the approved NSO ITP and associated HCP, the approved sustained yield plan for the Plan Area, and Simpson's operational policies and plans.

As currently occurs, Simpson foresters would develop and design site-specific measures to address potentially significant environmental effects that otherwise might not be adequately addressed by application of the prescriptive measures contained in the FPRs. A multi-disciplinary team composed of representatives from North Coast RWQCB, CDFG, the California Department of Mines and Geology, and other resource agencies such as NMFS and USFWS would review each proposed THP and, where necessary, would identify additional site-specific measures to avoid or mitigate potentially significant environmental impacts.

Some measures benefiting ITP and/or ESP species would be implemented in the Plan Area (a) under the NSO HCP; (b) in compliance with existing laws and regulations that apply to watershed impacts, sensitive species, cumulative impacts, and the prohibition on take; and (c) as a result of Simpson's continued participation in monitoring and habitat enhancement projects within the region.

Simpson considered but rejected the No Permits/No Plan Alternative because it does not offer a long-term solution for reconciling Simpson's operations with ESA requirements that apply to ITP species (or the ESP species should they be listed). Further, as discussed in Section 7, Simpson believes that the Plan as proposed will have significant beneficial effects for Covered Species that the No Permit/No Plan strategy cannot provide.

8.2 LISTED ITP SPECIES ONLY

Under the Permit/Plan for ITP species Only Alternative,

- NMFS would issue the ITP for the three listed salmonids;
- The unlisted salmonids under NMFS jurisdiction would not be covered by the ITP but could be added to the Plan and ITP through amendments if listed;
- Simpson would not seek an ESP for the three unlisted species under USFWS jurisdiction; and
- The Plan's purpose and scope and Simpson's responsibilities under the Plan would be narrowed technically and legally to the listed ITP species.

Incidental take of the three listed salmonids would be authorized under the Plan and ITP; however, no advance authorization for take of the ESP species or the unlisted ITP species would be given. If one or more unlisted species became listed, Simpson would be subject to the ESA prohibition on take and could seek take authorization from the Services.

Except for certain monitoring measures, the conservation program under the Listed ITP species Only Alternative would be very similar to that in Section 6.2. This is because, as discussed in Section 7, the Plan as proposed is based on the premise that factors higher in the watersheds (where the ESP amphibian species occur) are responsible for conditions in the lower watersheds (where the ITP species occur). None of the conservation measures was specifically intended to benefit either group of Covered Species (amphibians or salmonids) exclusively, and no distinction was made based on the listing status of the species. Under this alternative, measures implemented higher in the watersheds would be beneficial, improving conditions for the listed salmonids, and also for the unlisted Covered Species. Benefits for the unlisted ITP species would likely be the same as under the Plan as proposed. However, without the CCAA/ESP, the incentive as well as the requirement to provide conservation benefits for the ESP species is removed.

Simpson considered the Listed ITP Species Only alternative during preparation of the Plan and rejected it as counter to sound planning principles. In addition, the alternative would not provide adequate long-term assurances to Simpson that operations could continue in watersheds covered by the Plan if one or more of the unlisted Covered Species were listed.

8.3 SIMPLIFIED PRESCRIPTIONS STRATEGY

Under the Simplified Prescriptions Strategy Alternative,

- The Services would issue the Permits for Covered Species as proposed in this Plan; and
- Simpson would implement a modified AHCP/CCAA with a simplified conservation strategy of fixed, no-cut riparian buffers.

Instead of the combination of programs and default prescriptions in the Plan as proposed, the conservation strategy of this alternative would focus on establishing permanent, uniform buffers on Class I and II watercourses, with existing protections maintained at Class III sites. Under this modified strategy, existing measures employed by Simpson to protect Class I, Class II, and Class III watercourses would be supplemented as follows;

- Class I buffers would have fixed widths of 200 feet (slope distance). No timber harvesting, forest management, or use of heavy equipment would be allowed in the buffer (with the exception of creating cable-yarding corridors when other options are impractical and use of existing roads and watercourse crossings for log hauling and access purposes).
- Class II buffers would have fixed widths of 130 feet (slope distance). No timber harvesting, forest management, or use of heavy equipment would be allowed in the buffer (with the exception of creating cable-yarding corridors when other options are impractical and use of existing roads and watercourse crossings for log hauling and access purposes).
- Ponds, swamps, bogs, and seeps that support aquatic species would also be afforded the same protection as other Class II watercourses.
- Protection for Class III watercourses where no aquatic life is present would be the same as under existing regulations (i.e., 25- to 50-foot ELZs; limits on heavy equipment use; timber harvesting allowed in ELZs). Under some circumstances, WLPZs could be established for Class III watercourses in lieu of ELZs.

Some monitoring would be conducted to demonstrate compliance and track effectiveness, as required for the ITP and ESP. This alternative would avoid incidental take of Covered Species associated with the impacts of harvesting, management, and equipment use in riparian zones, and the fixed no-cut buffers would be means of assuring avoidance, setting aside habitat for the species, and mitigating any indirect or cumulative impacts from other activities. Because no harvesting or management of the Class I and II buffers would occur, thus minimizing take and thereby limiting the impacts of any take that could occur, there would be less of a rationale and need for the other components of the Plan as proposed, which consist primarily of special measures for riparian zones, impact-specific mitigation, and interactive monitoring and adaptive management measures. The premise of this approach is that Covered Species and their habitats would benefit from the impact avoidance.

Simpson considered this alternative during preparation of the Plan and rejected it because the permanent commitment of land and resources represented by the fixed buffers would be disproportionate mitigation for minimal impacts under this take avoidance strategy. Simpson also believes that the Plan as proposed is a superior conservation strategy because it would avoid take to the maximum extent practical in riparian zones while enacting additional measures to improve, not just avoid impacts to, habitat conditions.

8.4 EXPANDED PLAN AREA/SPECIES LIST

Under the Expanded Plan Area/Species List Alternative:

- The Plan Area would be expanded to include an additional 26,116 acres of “rain-on-snow” areas;
- The ITP from NMFS would cover the same listed and unlisted salmonid ESUs as the Plan as proposed;
- Simpson would seek an ITP from USFWS that would cover a total of 9 species: the three ESP species identified in the Plan as proposed, one listed fish species (tide water goby), two listed bird species (bald eagle and marbled murrelet), two additional unlisted amphibians (foothill yellow-legged frog and northern red-legged frog) and one unlisted reptile (western pond turtle) (see Table 8-1);
- The Plan would be modified to include impact avoidance, impact minimization and mitigation, and monitoring measures that meet ITP standards for each of the added species and to address the potential for unique impacts in the rain-on-snow areas.

Table 8-1. Added Species under Expanded Plan Area and Species List Alternative.

Common Name	Scientific Name	Federal Status	State Status
Tidewater goby	<i>Eucyclogobius newberryi</i>	FE	CSC
Foothill yellow-legged frog	<i>Rana boylei</i>	FSC, FSS	CSC/CFP
Northern red-legged frog	<i>Rana aurora aurora</i>	FSC, FSS	CSC/CFP
Western pond turtle	<i>Clemmys marmorata marmorata</i>	FSC, FSS	CSC/CFP
Marbled murrelet	<i>Brachyramphus marmoratus</i>	FT	SE
Bald eagle	<i>Haliaeetus leucocephalus</i>	FT	SE
<u>Federal Status</u>			
FE	Federal endangered species		
FT	Federal threatened species		
FSC	Federal species of concern		
FSS	Forest Service sensitive species		
<u>State Status</u>			
SE	California endangered species		
CSC	CDFG Species of Special Concern		
CFP	California Fully Protected Species		

Under this alternative, incidental take of the original list of Covered Species potentially would be greater than under the Plan as proposed because of the expansion in Plan Area and potential for harvesting to occur in areas currently subject to “no take” regulations because of the presence of other listed species. However, as required for the ITP and ESP, the impacts of such take would be minimized and mitigated to the maximum extent practicable and early conservation benefits would be provided. The take of other Covered Species under this alternative also would be subject to ITP and ESP avoidance, mitigation and other requirements. Excluding potential modifications for rain-on-snow areas, the measures for the original list of Covered Species would not change, and the beneficial effects for them would likely be essentially the same as under the Plan as proposed.

Simpson considered this approach during the preparation of the Plan and rejected it in favor of limiting the Plan and permit application to the six cold-water adapted aquatic species. This decision does not preclude future amendments to the Plan to include other species or the development of separate HCP/ITPs or CCAA/ESPs for other species. Further, as discussed in Section 1.4, Simpson proposes to use the Plan as proposed as the framework for other conservation efforts; and implementation of the AHCP/CCAA in combination with Simpson's NSO HCP will provide significant protection and benefits to a broad range of aquatic and terrestrial species in the Plan Area.

